

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL
	:	
vs.	:	No: 01-CR-0131-10
	:	(Hon. Sylvia H. Rambo,
Leslie Card,	:	U.S.D.J.)
Defendant	:	
	:	(Electronically Filed)

**MOTION TO EXTEND TIME TO FILE OBJECTIONS TO
PRE-SENTENCE INVESTIGATION REPORT**

COMES NOW the Defendant Charles Leslie Card, by and through the undersigned counsel, and respectfully files this Motion to Extend Time to File Objections to Pre-Sentence Investigation Report ("PSR"), and, in support of this Motion, would show this Honorable Court the following:

1. The draft PSR in this cause was received by undersigned counsel on Friday, February 22, 2008.
2. Objections, or another response, to the draft PSR are due by Monday, March 10, 2008.
3. There are issues and facts in the draft PSR which must be reviewed with Mr. Card and, if needed, must be further researched and investigated before a proper response, including objections, if any, can be made to the draft PSR.

4. Because of undersigned counsel's schedule, and because Mr. Card is located at Perry County Prison, undersigned counsel has been unable to date to meet with Mr. Card to review and discuss the facts and issues presented by the draft PSR.

5. Undersigned counsel will not be able to meet with Mr. Card until Wednesday, February 27, 2008.

6. Moreover, undersigned counsel will be away from his office from Tuesday, March 4 through Sunday, March 16, 2008.

7. Accordingly, additional time is needed to prepare a proper and complete response, including objections, if any, to the PSR.

8. Undersigned counsel has requested concurrence with this motion from government counsel and concurrence has been given.

9. Mr. Card, through his undersigned attorney, respectfully asks that the time to file objections, or another response, to the draft PSR be extended for thirty (30) days, or until April 10, 2008.

WHEREFORE, the Defendant Charles Leslie Card respectfully asks that the Court grant this Motion and extend the time to file objections, or another response, to the PSR, as aforesaid.

Respectfully submitted,

/s/ Guillermo L. Bosch
Guillermo L. Bosch
Attorney I.D. No. PA20279

Attorney for Defendant

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Date: February 25, 2008

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL
	:	
vs.	:	No: 01-CR-0131-10
	:	(Hon. Sylvia H. Rambo,
Leslie Card,	:	U.S.D.J.)
Defendant	:	
	:	(Electronically Filed)

CERTIFICATE OF CONCURRENCE

I hereby certify that undersigned counsel, pursuant to LR 7.1, has sought concurrence in the motion herein from counsel for the government, listed below, and concurrence has been given.

Christy H. Fawcett
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Defendant	:	
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CERTIFICATE OF SERVICE

I hereby certify that this document has been filed electronically and is available for viewing and downloading from the ECF system and that service upon all interested parties indicated below was made electronically on this date:

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